



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 8/18/2020

epierre@seyfarth.com
T (212) 218-5611

www.seyfarth.com

August 14, 2020

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007
Email: Torres_NYSDChambers@nysd.uscourts.gov

Re: *Sherry Grimes-Jenkins v. Consolidated Edison of New York, Inc.*
Civil Action No. 16-cv-04897(AT)(RWL)
Related Case: *Sherry Grimes-Jenkins v. Consolidated Edison Company of New York, Inc. & Sean Green; Civil Action No. 18-cv-01545(AT)(RWL)*

Dear Judge Torres:

This firm represents Defendant Consolidated Edison Company of New York, Inc. ("Con Edison") in the above-referenced action. Together with Plaintiff's Counsel, we write in accordance with Rule I.C of your Honor's Individual Rules of Practice to request a brief two-week extension of the deadline for Con Edison's reply in further support of its motion for summary judgment from August 17, 2020 to August 31, 2020. An extension is necessary because the undersigned counsel was out of office attending to a family medical emergency.

In particular, the mother of the undersigned attorney was admitted to North Shore University Hospital for a heart ailment, which resulted in a surgical procedure to clear a heart blockage. Following her discharge from the hospital, the undersigned attorney assisted with her return home and returned to the office on August 13, 2020. This family medical emergency affected the preparation of Con Edison's reply papers. The undersigned counsel's participation in the preparation of Con Edison's reply papers is necessary because he is intimately familiar with the facts of this action. A two-week extension will permit the full participation of the undersigned counsel and the completion of Con Edison's reply papers.

As a result, the parties respectfully request a two-week extension of Con Edison's deadline to file its reply in further support of its motion for summary judgment from August 17, 2020 to August 31, 2020. If granted, no other deadlines will be effected. This is the parties' first request for an extension of Con Edison's deadline to file its reply in further support of summary judgment, and this request is made in good faith and not for the purpose of unnecessary delay.

The undersigned counsel thanks the Court for its kind consideration of this request as well as the unforeseen circumstances involved.



Hon. Analisa Torres
August 14, 2020
Page 2

Very truly yours,

SEYFARTH SHAW LLP

/s/ *Ephraim J. Pierre*

Ephraim J. Pierre

cc: Attorneys of Record (via ECF)

GRANTED.

SO ORDERED.

Dated: August 18, 2020
New York, New York

A handwritten signature in black ink, appearing to read "AT".

ANALISA TORRES
United States District Judge